

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**
Pittsburgh Division

IN RE: MATTIE M DAVID	Case No. 18-22880-GLT Chapter 13
Freedom Mortgage Corporation, Movant	Hearing Date: TBD Hearing Time: TBD Objection Date: TBD
vs.	
MATTIE M DAVID , Debtor and Ronda J. Winnecour Respondent	

**EX PARTE MOTION FOR EXTENSION OF TIME TO RESPOND TO TRUSTEE'S
NOTICE OF FINAL CURE PAYMENT**

COMES NOW Freedom Mortgage Corporation (Movant) by and through counsel, Brock and Scott, PLLC, and respectfully moves this Court, for an Order extending the time to serve its answer, pleadings, or motions in response to Trustee's Notice of Final Cure Payment.

1. Trustee filed the Notice of Final Cure Payment on October 9, 2023.
2. The filing and service of Movant's answer, pleadings, or motions in response to Trustee's Notice of Final Cure Payment is due October 30, 2023.
3. Movant has not previously been granted an extension in this matter.
4. Movant's prescribed time period for filing and service of its answer, pleadings, or motions in response to Trustee's Notice of Final Cure Payment has not expired.

5. Movant needs additional time in order to review and prepare its response to Trustee's Notice of Final Cure Payment.
6. Movant has submitted a proposed order contemporaneously with the filing of this Motion.
7. Movant requests an extension of time to file an answer, pleading, or motions in response to Trustee's Notice of Final Cure Payment.
8. Movant requests an extension of time to file an answer, pleading, or motions in response to Trustee's Notice of Final Cure Payment to November 10, 2023.

WHEREFORE, the Movant respectfully prays that this Court enter an Order enlarging their time for service of answers, pleadings, or motions in response to Trustee's Notice of Final Cure Payment up to and including November 10, 2023.

This, the 30th day of October, 2023.

/s/Ryan Starks

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

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**CERTIFICATE OF SERVICE OF MOTION TO EXTEND TO RESPOND TO NOTICE
OF FINAL CURE PAYMENT**

I certify under penalty of perjury that on this day, I served or caused to be served the Motion to Extend to Respond to Notice of Final Cure Payment on the parties at the addresses shown below or on the attached list.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was:

Via CM/ECF electronic notice:

Daniel R. White, Esq.
18 Mill Street Square
P.O. Box 2123
Uniontown, PA 15401
Counsel for Debtor

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219
Chapter 13 Trustee

Office of the United States Trustee
Liberty Center.
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222
US Trustee

Via First Class Mail:

MATTIE M DAVID
54 AREFORD BOULEVARD
UNIONTOWN, PA 15401
Debtor

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, names and addresses of parties served by electronic notice will be listed under the heading "Via CM/ECF electronic notice" and those served by mail will be listed under the heading "Via First Class Mail".

EXECUTED ON: October 30, 2023

/s/Ryan Starks
Andrew Spivack, PA Bar No. 84439
Matthew Fissel, PA Bar No. 314567
Mario Hanyon, PA Bar No. 203993
Ryan Starks, PA Bar No. 330002
Jay Jones, PA Bar No. 86657
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PAWB Local Form 7 (07/13)